

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**DALLAS GARCIA, Individually and as §  
A representative of the Estate of FRED §  
HARRIS, deceased, §  
Plaintiff, §**

**v. §**

**HARRIS COUNTY, TX. and HARRIS §  
COUNTY SHERIFF'S OFFICE, §  
Defendants. §**

**Civil Action No.: 4:22-cv-3093**

**DEFENDANT HARRIS COUNTY'S SECOND SUPPLEMENTAL DISCLOSURES**

TO: DALLAS GARCIA, Plaintiff, c/o Randall Kallinen and Alexander Johnson, Kallinen Law, PLLC, 511 Broadway Street, Houston, TX 77012.

In accordance with Federal Rule of Civil Procedure 26(a), Defendant HARRIS COUNTY ("Harris County" or "the County") provides the following supplemental information:

**B. Documents That Support Claims or Defenses (Rule 26(a)(1)(A)(ii)):**

(1) Per the Confidentiality and Protective Order [Doc. #25], Harris County produces the following documents that have been redacted and marked as confidential:

|        |  |
|--------|--|
| 000507 | Video-Ownby escorted to 3rd Floor holding cell 10-29-21                  |
| 000508 | Video-Ownby and Harris in 3rd Floor holding cell 10-29-21                |
| 000509 | Video-DO Area at 3rd Floor 10-29-21                                      |
| 000510 | Video-DO Area at 3rdFloor 10-29-21                                       |
| 000511 | Video-Harris exits Gen. Pop. 10-29-21                                    |
| 000512 | Video-DO Area at 3rd Floor 10-29-21                                      |
| 000513 | Video-Harris escorted to 3rd Floor holding cell 10-29-21                 |
| 000514 | Video-Harris in 3rd Floor Hallway 10-29-21                               |
| 000515 | Video-Harris placed in 3rd Floor holding cell 10-29-21                   |
| 000516 | Video-Harris escorted to 3rd Floor holding cell 10-29-21                 |
| 000517 | Video-DO Area at 3rd Floor 10-29-21                                      |
| 000518 | Video-Ownby Assaults Harris 10-29-21                                     |
| 000519 | Video-DO Area at 3rd Floor 10-29-21                                      |
| 000520 | Video-DO Area at 3rd Floor 10-29-21                                      |
| 000521 | Video-3rd Floor Elevator Lobby after assault by Ownby 10-29-21           |
| 000522 | Video-removal of Harris out of holding cell after Ownby assault 10-29-21 |
| 000523 | Video- D.O. area   |

|        |   |
|--------|---|
| 000524 | Video-elevator                            |
| 000525 | Video-Harris carried into/out of elevator |
| 000526 | Video-Medical Hallway                     |
| 000527 | Video-Medical Hallway                     |
| 000528 | Video-Medical Hallway                     |
| 000529 | Video-Medical area                        |
| 000530 | Video-Sally Port area                     |
| 000531 | Video-Sally Port area                     |

(2) Harris County previously produced redacted copies of documents/evidence under bates ##HC\_F.Harris\_000001-000077; 000079; 000085-000136; 000142-000145; 000147-172; 000226-000235; 000293-000329; 000331-000498]

(3) Harris County previously identified the following documents that are in the possession, control and custody of third parties, which Plaintiff has equal access via subpoena:

- Houston Fire Department Patient Care Report-Incident #2110291094
- Texas Department of Public Safety Report #2021I-TRA-50080441
- Houston Police Department Offense Report #136767721
- The Harris Center for Mental Health and IDD
- University of Texas Medical Branch
- White Oaks Hospital

Respectfully submitted,

OF COUNSEL:

CHRISTIAN MENEFEE  
TEXAS BAR NO. 24088049  
HARRIS COUNTY ATTORNEY

Date: January 19, 2023.

By: /s/ Jennifer F. Callan  
JENNIFER F. CALLAN  
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**Attorneys for Defendant Harris County**

## **CERTIFICATE OF SERVICE**

I certify that, pursuant to Federal Rules of Civil Procedure, a true copy of the instrument to which this Certificate is attached was duly served upon each party to this cause via email and regular mail:

Randall Kallinen  
Alexander Johnson  
Kallinen Law, PLLC  
511 Broadway Street  
Houston, TX 77012

/s/ Jennifer F. Callan  
Jennifer F. Callan